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August 11, 2021

**VIA E-FILING (CM/ECF)**

Hon. Joan M. Azrack, U.S.D.J.  
United States District Court  
Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, New York 11722

**Re: *Owhonda v. Credit Acceptance Corporation, et al.***  
**E.D.N.Y. Case No. 2:21-cv-03413-JMA-ARL**  
**Consent Request for Extension of Time to Answer, Move, or Otherwise**  
**Respond to Plaintiff's Complaint**

Dear Judge Azrack:

This firm represents Defendant Credit Acceptance Corporation ("Credit Acceptance") in the above-referenced action. Pursuant to Rule III.B. of Your Honor's Individual Rules, Credit Acceptance hereby respectfully requests an extension of time, up to and including **Tuesday, August 31, 2021**, to answer, move, or otherwise respond to the Complaint filed by Plaintiff Alexander Owhonda ("Plaintiff") on June 17, 2021 [CM/ECF Doc. 1].

Although it now appears that Credit Acceptance was served through the New York Secretary of State on June 25, 2021, as evidenced by the letter attached hereto as **Exhibit A**, the Secretary of State did not forward any notice of service until August 2, 2021 – *i.e.*, well after Credit Acceptance's time to answer, move, or otherwise respond to Plaintiff's Complaint technically expired on July 16, 2021. Upon finally receiving notice of service, Credit Acceptance retained the undersigned, who immediately inquired of Plaintiff's counsel regarding the requested extension. Plaintiff's counsel promptly consented.

The requested extension is necessary to allow Credit Acceptance to fully and properly respond to the Complaint, and it will also allow the parties to attempt to resolve some or all of the claims in this matter without further litigation. This is Credit Acceptance's first request for an extension of time to answer, move, or otherwise respond to the Complaint in this matter, and the extension will not materially affect any other scheduled deadlines or court appearances.

**McLaughlin & Stern, LLP**  
Hon. Joan M. Azrack, U.S.D.J.  
August 11, 2021  
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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ch. R. Ostrowski". The signature is fluid and cursive, with the first name "Ch." and last name "Ostrowski" clearly distinguishable.

Chester R. Ostrowski

cc: All Counsel of Record (via CM/ECF)

# EXHIBIT A

STATE OF NEW YORK  
DEPARTMENT OF STATE

ONE COMMERCE PLAZA  
99 WASHINGTON AVENUE  
ALBANY, NY 12231-0001  
WWW.DOS.NY.GOV

ANDREW M. CUOMO  
GOVERNOR

ROSSANA ROSADO  
SECRETARY OF STATE

August 02, 2021

CORPORATION SERVICE COMPANY  
80 STATE STREET  
ALBANY NY 12207, USA

RE: Party Served: CREDIT ACCEPTANCE CORPORATION  
Plaintiff/Petitioner: ALEXANDER OWHONDA  
Receipt Number: 202108020273  
Date Served: 06/25/2021  
Section of Law: SECTION 306 OF THE BUSINESS CORPORATION LAW

To whom it may concern:

Enclosed is a legal document that was served upon the Secretary of State as the designated agent of the above named party. The Department of State is required by law to forward this legal document to the address on file for such party. This office is not authorized to offer legal advice. If you have any questions concerning this document, please contact your attorney.

Sincerely,

Department of State  
Division of Corporations, State Records  
and Uniform Commercial Code  
(518) 473-2492



Department  
of State